



July 26, 2018

VIA ECFS
Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: The Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certification, WC Docket Nos. 18-143, 10-90, and 14-58

Dear Ms. Dortch:

With the Federal Communications Commission's ("Commission") release of the above-referenced notice of proposed rulemaking seeking inputs on how to best structure the allocations of the second stage of the Uniendo a Puerto Rico and Connect USVI Funds,¹ the Satellite Industry Association ("SIA")² reiterates its support for a funding framework that does not favor any one technology over others.³ While SIA does not generally have a position in the Connect America Fund-related proceedings, SIA strongly supports the Commission's longstanding policy of technology neutrality, which has served the public interest by fostering increased innovation and service quality while reducing costs to consumers.

Innovations in the satellite industry, including advancements in high-throughput satellites, present important potential solutions for the deployment problems that the

¹ *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, et al. Order and Notice of Proposed Rulemaking*, FCC 18-57 (2018) ("PR/USVI Fund NPRM").

² SIA Executive Members include: AT&T Services, Inc.; The Boeing Company; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Maxar Technologies; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; Spire Global, Inc.; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Analytic Graphics Inc.; Artel, LLC; Blue Origin; DataPath Inc.; Eutelsat America Corp; ExoAnalytic Solutions; Globecom; Glowlink Communications Technology, Inc.; Hawkeye360; Hughes Government Solutions; Inmarsat, Inc.; Kymeta Corporation; L3 Technologies.; Panasonic Avionics Corporation; Planet; Telesat; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC. For more information, visit www.sia.org.

³ See Letter from Tom Stroup, President, SIA, to Marlene Dortch, Secretary, FCC, WC Docket No. 10-90 (filed May 12, 2016); see also Letter from Tom Stroup, President, SIA, to Marlene Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Dec. 29, 2015).



Commission is currently seeking to address in the disaster ravaged regions of Puerto Rico and the U.S. Virgin Islands. These benefits have been affirmed to the Commission through early filings in this proceeding by residents and organizations in Puerto Rico.⁴

SIA strongly encourages the Commission to ensure that any measures adopted to allocate support in these regions demonstrate a continued commitment to the longstanding policy of technology neutrality.

Respectfully submitted,

/s/

SATELLITE INDUSTRY ASSOCIATION

Tom Stroup, President

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⁴ See Comments of Liga de Cooperativas de Puerto Rico, WC 18-143 et. al., Jul. 2, 2018 ("Satellite broadband was the only reliable communications system [*sic*] in the aftermath of the hurricanes and must be fully implemented across the island to build a truly resilient and connected Puerto Rico."; "Advances in technology now offer next-generation satellite system [*sic*] that can provide Puerto Rico with the latest technology and ever-increasing broadband speeds."); See also Comments of the Puerto Rico Manufacturers Association, WC 18-143 (Jul. 3, 2018); see also Casa Pueblo, WC 18-143 et. al (Jul. 5, 2018).